

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

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|-------------------------------------|---|--------------------------------|
| 1) VIDEO GAMING TECHNOLOGIES, INC., |) | |
| |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | Case No. 4:17-cv-00454-GKF-JFJ |
| |) | |
| 1) CASTLE HILL STUDIOS LLC |) | |
| (d/b/a CASTLE HILL GAMING); |) | |
| 2) CASTLE HILL HOLDING LLC |) | |
| (d/b/a CASTLE HILL GAMING); and |) | |
| 3) IRONWORKS DEVELOPMENT, LLC |) | |
| (d/b/a CASTLE HILL GAMING) |) | |
| |) | |
| Defendants. |) | |

**DECLARATION OF PETER SWANSON IN SUPPORT OF PLAINTIFF VIDEO
GAMING TECHNOLOGIES, INC.’S OPPOSITION TO DEFENDANTS’
MOTION IN LIMINE TO EXCLUDE EVIDENCE OF DOCUMENTS AND
MATERIALS ALLEGEDLY TAKEN BY FORMER VGT EMPLOYEES**

1. I am an attorney with the law firm of Covington & Burling LLP, counsel for Plaintiff Video Gaming Technologies, Inc. (“VGT”). I was admitted *pro hac vice* in this matter on August 8, 2017.

2. Attached as **Exhibit R** is a true and correct copy of excerpts from the deposition testimony of Richard Sisson, dated August 2, 2018.

3. Attached as **Exhibit S** is a true and correct copy of VGT’s Deposition Exhibit 256 from the deposition of Alan Roireau taken on May 15, 2018 (CHG0023869-70).

4. Attached as **Exhibit T** is a true and correct copy of VGT’s Deposition Exhibit 474 from the deposition of Seth Morgan taken on July 13, 2018 (CHG0124177-84).

5. Attached as **Exhibit U** is a true and correct copy of VGT’s Deposition Exhibit 416 from the deposition of Jason Sprinkle taken on July 11, 2018 (CHG0019199).

6. Attached as **Exhibit V** is a true and correct copy of Interrogatory No. 13 in VGT's First Set of Interrogatories to CHG, dated September 25, 2017.

7. Attached as **Exhibit W** is a true and correct copy of CHG's response to Interrogatory No. 13 in VGT's First Set of Interrogatories to CHG, dated November 22, 2017, with corresponding Verification.

8. Attached as **Exhibit X** is a true and correct copy of CHG's amended response to Interrogatory No. 13 in VGT's First Set of Interrogatories to CHG, dated February 5, 2018, with corresponding Verification.

9. Attached as **Exhibit Y** is a true and correct copy of Request for Admission No. 1 in VGT's First Set of Requests for Admission to CHG, dated January 5, 2018.

10. Attached as **Exhibit Z** is a true and correct copy of CHG's response to Request for Admission No. 1 in VGT's First Set of Requests for Admission to CHG, dated February 5, 2018.

11. Attached as **Exhibit AA** is a true and correct copy of excerpts from the deposition testimony of Alan Roireau, dated August 1, 2018.

12. Attached as **Exhibit BB** is a true and correct copy of excerpts from the deposition testimony of Jason Sprinkle, dated May 18, 2018.

13. Attached as **Exhibit CC** is a true and correct copy of excerpts from the deposition testimony of Alan Roireau, dated May 15, 2018.

14. Attached as **Exhibit DD** is a true and correct copy of excerpts from the deposition testimony of Brandon Booker, dated July 10, 2018.

15. Attached as **Exhibit EE** is a true and correct copy of excerpts from the deposition testimony of Seth Morgan, dated July 13, 2018.

16. Attached as **Exhibit FF** is a true and correct copy of VGT's Deposition Exhibit 470 from the deposition of Seth Morgan taken on July 13, 2018 (CHG0124213-22).

17. Attached as **Exhibit GG** is a true and correct copy of excerpts from the deposition testimony of Richard Sisson, dated April 17, 2018.

18. Attached as **Exhibit HH** is a true and correct copy of VGT's Deposition Exhibit 107 from the deposition of Richard Sisson taken on April 17, 2018 (CHG0007847-48).

19. Attached as **Exhibit II** is a true and correct copy of CHG's response to Interrogatory No. 17 in VGT's Third Set of Interrogatories to CHG, dated April 2, 2018.

20. Attached as **Exhibit JJ** is a true and correct copy of VGT's Deposition Exhibit 106 from the deposition of Richard Sisson taken on April 17, 2018 (CHG0034012).

21. I declare under penalty of perjury that the foregoing is true and correct.
Executed on November 16, 2018 in Washington, District of Columbia.

/s/ Peter Swanson
Peter Swanson

CERTIFICATE OF SERVICE

I hereby certify that on November 16, 2018, I filed the foregoing Declaration via ECF,
which caused service to be effected on the following counsel for Defendants:

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